MICHAEL R. HALL 1 Nevada Bar No. 5978 2 mhall@lawhjc.com ASHLIE L. SURUR, ESQ. Nevada Bar No. 11290 3 asurur@lawhjc.com 4 HALL, JAFFE & CLAYTON, LLP 5 7425 Peak Drive Las Vegas, Nevada 89128 (702) 316-4111 6 Fax (702) 316-4114 7 8 Attorneys for Defendant/Cross Claimant Shelton Brothers, Inc. 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 DONALD NICHOLSON, Case No.: 2:16-cv-01335-RFB-VCF 12 PLAINTIFF, STIPULATION AND ORDER TO 13 EXTEND TIME TO RESPOND TO VS. PLAINITIFF'S MOTION FOR LEAVE 14 TO EXCUSE TREATING PHYSICIANS DISPACK PROJECTS NV D/B/A DOLIUM, FROM PREPARING EXPERT 15 A BELGIAN COMPANY: SHELTON **REPORTS** (Third Request) BROTHERS, INC., A MASSACHUSETTS 16 CORPORATION; ADVANTAGE TRANSPORTATION, INC., A UTAH 17 CORPORATION; ROE DISTRIBUTORS I-V; ROE MANUFACTURERS I-V; ROE 18 TRANSPORTERS I-V; DOES I THROUGH X; AND ROE CORPORATIONS I THROUGH 19 X, INCLUSIVE, 20 DEFENDANTS. 21 SHELTON BROTHERS, INC., A MASSACHUSETTS CORPORATION. 22 CROSS-CLAIMANT, 23 V. 24 DISPACK PROJECTS NV D/B/A DOLIUM, 25 A BELGIAN COMPANY; ADVANTAGE TRANSPORTATION, INC., A UTAH 26 CORPORATION. 27 CROSS-DEFENDANTS.

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STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO PLAINITIFF'S MOTION FOR LEAVE TO EXCUSE TREATING PHYSICIANS FROM PREPARING EXPERT REPORTS (Third Request)

Pursuant to Local Rules ("LR") IA 6-1, the parties, by and through their respective attorneys, stipulate as follows:

- 1. On September 13, 2018 Donald Nicholson filed a Motion for Leave to Excuse Treating Physicians From Preparing Expert Reports. ECF No. 54.
- 2. The response to the Motion for Leave to Excuse Treating Physicians from Preparing Expert Reports [ECF No. 54] was due September 27, 2018 until the parties requested and obtained an extension of the response deadline to October 5, 2018. [ECF No. 57] and October 9, 2018 [ECF No. 59].
- 3. Counsel for Plaintiff and Defendant Shelton Brothers, Inc. ("Shelton Brothers") met and conferred today about the contents of the motion and Shelton Brothers' anticipated response. Counsel believes that they can prepare a stipulation that addresses the issues raised in the motion and Shelton Brothers' anticipated response. Such a stipulation would render the motion moot and Plaintiff would likely withdraw the motion once the court enters an order on the stipulation. For these reasons, the parties agree that there is good cause to extend the response deadline. The extension of time will afford the parties necessary time to prepare a stipulation and submit the stipulation to this court for review and approval. As the extension is likely to result in an informal resolution of the issues raised by the motion and a withdrawal of the motion, the extension will conserve judicial resources and litigation costs.

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1	4. The parties therefore stipulate to extend the response deadline from October 9,	
2	2018 to October 19, 2018.	
3	Dated October 9, 2018.	Dated October 9, 2018.
4	HALL, JAFFE & CLAYTON, LLP	GANZ & HAUF
5	By: <u>/s/Ashlie L. Surur</u> Michael R. Hall, Esq.	By: <u>Cara Xidis</u> Cara Xidis, Esq.
6	Nevada Bar No. 5978 Ashlie L. Surur, Esq.	Nevada Bar No. 11743 8950 W. Tropicana Ave, Ste 1
7	Nevada Bar No.11290 7425 Peak Drive	Las Vegas, NV 89147 Attorneys for the Plaintiff
8	Las Vegas, Nevada 89128 Attorneys for Defendant/Cross	
9	Claimant Shelton Brothers, Inc. Dated October 9, 2018.	
10	Dated October 7, 2010.	
11	By: /s/Kenneth E. Goates Kenneth E. Goates, Esq.	
12	Nevada Bar No. 8087 Mikesell Law Offices	
13	7251 West Lake Mead, #250 Las Vegas, NV 89128	
14	Attorney for Advantage Transportation	
15	<u>OR</u>	<u>DER</u>
15 16	IT IS SO ORDERED.	<u>DER</u>
	IT IS SO ORDERED.	<u>DER</u>
16	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17	IT IS SO ORDERED. RICHARD F. BOULWARE, II	<u>DER</u>
16 17 18	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19 20	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19 20 21	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19 20 21 22 23 24	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19 20 21 22 23 24 25	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19 20 21 22 23 24 25 26	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	<u>DER</u>
16 17 18 19 20 21 22 23 24 25	IT IS SO ORDERED. RICHARD F. BOULWARE, II United States District Court	DER